

PAUL HASTINGS

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September 28, 2021

The Honorable Brian M. Cogan
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Al Malik Alshahhi, et al.*, 21-CR-371

Dear Judge Cogan:

On behalf of Thomas J. Barrack, Jr., a defendant in the above-captioned case, we respectfully request the Court's permission for Mr. Barrack to travel to New York City to attend a memorial service on October 7, 2021. The government and Pretrial Services have consented to this request.

With the Court's permission, Mr. Barrack would travel to New York, NY on October 6, 2021 and return on October 8, 2021. While in New York, Mr. Barrack would stay at a hotel. The government and Pretrial Services will be informed of Mr. Barrack's specific travel itinerary if this request is granted.

Mr. Barrack's Conditions of Release currently permit him to travel within the Central District of California and the District of Colorado, and to the Eastern and Southern Districts of New York for the purposes of traveling to and from the Court in this matter (Dkt. 15). While in New York, Mr. Barrack would continue to be subject to all other Conditions of Release, including his curfew, GPS monitoring, and reporting to Pretrial Services as directed.

Mr. Barrack has been fully compliant with the conditions of his pretrial supervision. He executed a bond for \$250,000,000, among other terms set out in his Conditions of Release. Mr. Barrack does not pose a flight risk.

Thank you for your consideration.

Sincerely,

/s/ Phara Serle Guberman

Phara Serle Guberman
of PAUL HASTINGS LLP

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cc: All Counsel of Record (via ECF)
Alexis Ochoa, Pretrial Services (via Email)
Manuel Ibanez, Pretrial Services (via Email)
Ramel Moore, Pretrial Services (via Email)